

IN THE CIRCUIT COURT OF THE 15th
JUDICIAL CIRCUIT, IN AND FOR PALM
BEACH COUNTY, FLORIDA

EMUNDO PEREZ, as Personal Representative
of the Estate of ASHLEY PEREZ, Deceased,
on behalf of the Estate of ASHLEY PEREZ
and the lawful survivors of the Decedent, To
Wit: AMALIA PEREZ, as surviving minor
Daughter, and DYLAN PEREZ, as surviving
Minor son,

Case No. 50 2015 CA 002369AN

Plaintiff,

vs.

WELLINGTON REGIONAL MEDICAL
CENTER, INC., individually and on behalf of its
agents, apparent agents, servants and employees;
JAMES JUSTIN GOAD, M.D.; PALM BEACH
GENERAL SURGERY d/b/a THE CENTER FOR
ADVANCED SURGICAL CARE; ST. MARY'S
MEDICAL CENTER, INC., d/b/a ST. MARY'S
MEDICAL CENTER; WILLIAM JEFFREY
DAVIS, D.O.; PALM BEACH TRAUMA
ASSOCIATES, individually and on behalf of its
partners, agents, apparent agents, servants and
employees; ROBERT BORREGO, M.D., P.A.,
independently and as general partner of PALM
BEACH TRAUMA ASSOCIATES; AHMED EL-
HADDAD, M.D., P.A.; DIMITER B. HRISTOV,
M.D., P.A., independently and as general partner of
PALM BEACH TRAUMA ASSOCIATES;
RAYMOND HENDERSON, SR., M.D.; and
RAYMOND HENDERSON, SR., M.D., P.A.,

Defendants.

**DEFENDANT'S, WELLINGTON REGIONAL MEDICAL
CENTER'S, INITIAL EXPERT WITNESS DISCLOSURE**

Defendant, WELLINGTON REGIONAL MEDICAL CENTER, INC., by and through its
undersigned counsel, and pursuant to this Court's June 7, 2017, Order on Motion for Case
Management Conference, files this its initial expert witness disclosure as follows:

1. Mary Zellinger, APRN, MN, ANP-BC, CCRN-CSC, CCNS
Emory University Hospital
1364 Clifton Road, NE
Atlanta, GA 30322

Mary Zellinger, APRN, MN, ANP-BC, CCRN-CSC, CCNS is a nursing expert. She is a Clinical Nurse Specialist in Critical Care. She is expected to testify on issues of nursing standard of care. She is expected to testify that the nurses at Wellington Regional Medical Center met the standard of care in their care and treatment of the decedent. Nurse Zellinger's opinions will be based upon her review of the medical charts, depositions and documents as well as her own education, training and experience. A copy of her curriculum vitae is attached hereto.

2. Eric Lichter, M.D.
Beth Israel Deaconess Medical Center
330 Brookline Avenue
Boston, MA 02215

Dr. Eric Lichter is an obstetrical expert. He is expected to testify on issues of standard of care and causation. Dr. Lichter will particularly focus on the care and treatment of Berto Lopez, M.D. Dr. Lichter will opine that that Dr. Berto Lopez deviated from accepted standards of care and cause and/or contributed to cause the death of Ms. Perez. Dr. Lichter's opinions will be based upon his review of the medical charts, depositions and documents as well as his own education, training and experience. A copy of his curriculum vitae is attached hereto.

3. John P. Kress, M.D., FCCP
University of Chicago
5841 South Maryland Avenue
MC 6026
Chicago, IL 60637

Dr. John P. Kress is a Pulmonology and Critical Care expert. Dr. Kress is expected to testify on issues of standard of care, causation and/or damages. Dr. Kress' opinions will be based upon his review of the medical charts, depositions and documents as well as his own education, training and experience. A copy of his curriculum vitae is attached hereto.

4. Jon B. Morris, M.D.
Hospital of the University of Pennsylvania
3400 Spruce Street, 4 Silverstein
Philadelphia, PA 19104-4283

Dr. Jon B. Morris is a General/GI Surgery expert. Dr. Kress is expected to testify on issues of standard of care, causation and/or damages. Dr. Morris' opinions

will be based upon his review of the medical charts, depositions and documents as well as his own education, training and experience. A copy of his curriculum vitae is attached hereto.

5. Dennis E. Coleman
10 Chaucer Lane
Ventura, CA 93003

Mr. Coleman is a Hospital Administration expert. Mr. Coleman is expected to testify on issues related to the operation and administration of a hospital such as Wellington Regional Medical Center including, but not limited to, such things as physician contacts and transfers. Dr. Morris' opinions will be based upon his review of the medical charts, depositions and documents as well as his own education, training and experience. A copy of his curriculum vitae is attached hereto.

7. Any and all treating physicians of the Plaintiffs/survivors/decedent listed on the witness disclosures in this matter.

8. Any and all expert witnesses disclosed by the other parties in this litigation.

Defendant, Wellington Regional Medical Center, reserves the right to amend and/or supplement this Expert Witness Disclosure as future discovery or court rulings necessitate upon proper notice to the parties and this Court.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished via Electronic mail on August 16, 2017 to: **see SERVICE LIST attached.**

THE LAW OFFICE OF JAY COHEN, P.A.
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By: _____

Jay Cohen, Fla. Bar No. 292192
Jeffrey L. Blostein, Fla. Bar No. 0086886

SERVICE LIST

Perez, et al. v. Wellington Regional Medical Center, et al.
Case No. 50 2015 CA 002369AN

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For Plaintiffs: *Edmundo Perez, as Personal Representative of the Estate of Ashley Perez, Deceased, on behalf of the Estate of Ashley Perez and the lawful survivors of the Decedent, To Wit: Amalia Perez, as surviving minor Daughter, and Dylan Perez, as surviving Minor son*

Scott E. Solomon, Esq.

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For Defs. *James Justin Goad, M.D.; and Palm Beach General Surgery d/b/a The Center for Advanced Surgical Care*

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For Defs. *Tenet St. Mary's, Inc., d/b/a St. Mary's Med Cntr; William Jeffrey Davis, DO; and Robert Borrego, M.D., P.A.*

Palm Beach Trauma Associates

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Defendant, In Pro Se

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For Defs. *Ahmed El-Haddad, M.D., PA; and, Dimiter B. Hristov, M.D., P.A.*

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For Defs. *Raymond Henderson, Sr., M.D., Raymond Henderson, Sr., M.D., PA*